



South Coast Air Quality Management District

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Review of the Draft Environmental Impact Report (DEIR) for the College of the Desert Indio Educational Center

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the Draft EIR the AQMD staff is concerned about potential localized air quality impacts to sensitive receptors (i.e., residences) in close proximity to the project site. Specifically, AQMD staff is concerned about the potential construction related air quality impacts to the residents located approximately 82 feet west of the project site along Oasis Street. On page III-47 of the Draft EIR the lead agency concluded that the project will have insignificant impacts on sensitive receptors, however, it does not appear that the lead agency conducted a localized construction emissions analysis. Further, it appears that the project's reported PM10 emissions of 20.49 pounds per day (Table III-14 of the Draft EIR) exceed the AQMD's localized PM10 construction emissions threshold. Therefore, AQMD staff recommends that the lead agency perform a localized significance analysis to demonstrate the project's localized air quality impacts by either using the LSTs developed by the AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>.

In the event that the lead agency finds any significant localized air quality impacts from the proposed project the lead agency should consider all feasible mitigation measures to reduce the project's air quality impacts. A list of construction related mitigation measures can be found at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, AQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

[IM:DG](#)

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